

ADRIENNE C. PUBLICOVER, ESQ. (SBN #161432)
DENNIS R. RHODES, ESQ. (SBN #168417)
WILSON, ELSE, MOSKOWITZ,
EDELMAN & DICKER LLP
525 Market Street, 17th Floor
San Francisco, California 94105
Telephone: (415) 433-0990
Facsimile: (415) 434-1370

Attorneys for Plaintiff and Counterdefendant
AMERICAN GENERAL ASSURANCE COMPANY
and Plaintiff THE UNITED STATES LIFE INSURANCE
COMPANY IN THE CITY OF NEW YORK

JOHN G. CLARK, ESQ. (SBN 35584)
LAW OFFICES OF JOHN G. CLARK
1201 Howard Avenue, Suite 202
Burlingame, CA 94010
Telephone: (650) 685-6660
Facsimile: (650) 685-6664

Attorneys for Defendant and Counterclaimant
PACIFIC A&M, INC. LTD., DBA PACIFIC A&M
ADMINISTRATORS and Defendant RON JONES

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO BRANCH**

| | | | |
|--------------------------------|---|----------------------------------|-------------|
| AMERICAN GENERAL ASSURANCE |) | Civil No. | C054193 CRB |
| COMPANY, and THE UNITED STATES |) | | |
| LIFE INSURANCE COMPANY IN THE |) | STIPULATION AND ORDER FOR | |
| CITY OF NEW YORK, |) | CONTINUANCE OF CASE | |
| |) | MANAGEMENT CONFERENCE | |

Plaintiffs,

v.

PACIFIC A&M, INC. LTD., DBA PACIFIC
A&M ADMINISTRATORS; RON JONES,
an individual; and DOES 1 through 50,

Defendants.

AND ALL RELATED ACTIONS

STIPULATION

Pursuant to this Court's Local Rules 6.2 and 7.12, this stipulation for continuance of the Case Management Conference is made by and between plaintiffs The United States Life Insurance Company and American General Assurance Company on the one hand, and defendants Ronald H. Jones (sued herein as Ron Jones) and Pacific A&M on the other, by and through their counsel of record and is based on the following facts:

1. On January 20, 2006, counsel for the parties appeared before this Court at the Case Management Conference. At that time, based on the discussion with the Court and between counsel, the Court set a further Case Management Conference for April 21, 2006, giving the parties time to engage in voluntary mediation to which both parties agreed. The Court did not set the trial date, or any pretrial dates.

2. Since the time of the January 20, 2006, Case Management Conference, the parties have discussed settlement on their own, without engaging in private mediation. To facilitate settlement, plaintiffs have been reviewing their files and records in order to assess the demand for payment asserted in defendant and counterclaimant Pacific A&M's counterclaim. That document review is ongoing and requires additional time to complete. By continuing the Case Management Conference for approximately 60 days, or to June 16, 2006, plaintiffs should be able to complete its document review and better assess defendant Pacific A&M's claim for payment, thereby facilitating settlement discussions.

3. In addition, the continuance will grant the parties time to engage in voluntary private mediation in advance of the continued conference date, should independent efforts at settlement be ineffective.

\\

\\

\\

\\

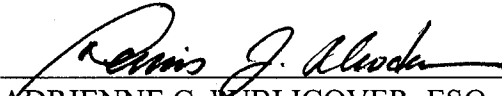
1 **IT IS HEREBY STIPULATED BY AND THROUGH THE PARTIES' COUNSEL OF**
2 **RECORD THAT:**

3 The Case Management Conference currently set for April 21, 2006, shall be continued to
4 June 16, 2006.

5 **SO STIPULATED.**

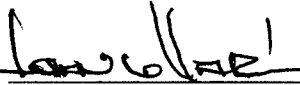
6 Dated: 3/10/06

WILSON, ELSER, MOSKOWITZ, EDELMAN &
DICKER, LLP

7
8 
9 ADRIENNE C. PUBLICOVER, ESQ.
DENNIS J. RHODES, ESQ.
Attorneys for Plaintiff and Counterdefendant
10 AMERICAN GENERAL ASSURANCE COMPANY
11 and Plaintiff THE UNITED STATES LIFE INSURANCE
12 COMPANY IN THE CITY OF NEW YORK

13 Dated: 15 MARCH 2006

John G. Clark, Esq.

14
15 
16 JOHN G. CLARK, ESQ.
Attorneys for Defendant and Counterclaimant
17 PACIFIC A&M, INC. LTD., DBA PACIFIC A&M
ADMINISTRATORS and Defendant RON JONES

18
19 **ORDER**

20 **PURSUANT TO THE STIPULATION, AND FOR GOOD CAUSE APPEARING, IT**
21 **IS HEREBY ORDERED THAT:**

22 The Case Management Conference is continued to June 16, 2006. The parties shall have up
23 to that date to conclude voluntary private mediation, if necessary.

24 **IT IS SO ORDERED.**

25 Dated: March 17, 2006

26 Honorable Charles R. Breyer
27 UNITED STATES DISTRICT COURT

